

STATIONARY SOURCE PERMIT TO CONSTRUCT AND OPERATE
This permit includes designated equipment subject to
National Emission Standards for Hazardous Air Pollutants for Source Categories.

This permit supersedes your permits dated July 20, 1988, January 24, 1995
amended March 1, 1996, August 7, 1998, amended January 22, 1999, December 15, 1999,
November 21, 2000, September 24, 2002, and May 28, 2004.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia
Regulations for the Control and Abatement of Air Pollution,

Norcraft Companies LLC
1 Millrace Dr.
Lynchburg, VA 24502
Registration No.: 30845
AIRS ID No.: 51-680-0154

is authorized to construct and operate

a kitchen and bathroom cabinet manufacturing facility

located at

1 Millrace Dr., Lynchburg, VA

in accordance with the Conditions of this permit.

Approved on DRAFT

T.L. Henderson
Regional Director, Department of Environmental Quality

Permit consists of 19 pages.
Permit Conditions 1 to 33.

INTRODUCTION

This permit approval is based on the permit applications dated September 26, 2006; March 19, 2004; August 27, 2002; November 5, 1997; December 28, 1994; and June 23, 1988, including amendment sheets dated October 24, 2006, October 4, 2006; March 12 and 26, 1998; February 14, 1996; and January 3, 4, 12, and 13, 1995. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-20 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. **Equipment List** - Equipment to be constructed at this facility consists of:

- additions to finishing line (Unit ID: F1) [MACT Subpart JJ] consisting of:
 - 1 topcoat spray booth [offline] (Unit ID: B13)
 - 1 glaze spray booth [offline] (Unit ID: B14)
 - 1 Production Systems natural gas drying oven (Unit ID: D2)

Previously permitted equipment at this facility prior to the date of this permit consists of:

- finishing line (Unit ID: F1) [MACT Subpart JJ] consisting of:
 - 2 toner spray booths (Unit IDs: B1, B2)
 - 1 stain spray booth [offline] (Unit ID: B3)
 - 2 stain booths (Unit IDs: OB1, OB2)
 - 2 sealer spray booths (Unit IDs: OB3, OB4)

- 3 topcoat spray booths (Unit IDs: OB5, OB6, OB8)
- 1 sealer/topcoat spray booth [offline] (Unit ID: B4)
- 1 Pneu-Mech natural gas drying oven (Unit ID: D1)
- 2 toner spray booths (Unit IDs: B5, B6)
- 2 stain spray booths (Unit IDs: B7, B8)
- 2 sealer spray booths (Unit IDs: B9, B10)
- 1 topcoat spray booth (Unit IDs: B11)
- 1 glaze spray booth (Unit ID: B12)
- woodworking operation (Unit ID: W1) consisting of 2 wood dust collection systems (Unit IDs: BH-1, BH-2) for assorted wood working equipment

(9 VAC 5-80-1100)

2. **Emission Controls** - Particulate emissions from the spray booths of the finishing line (F1) shall be controlled by dry filters. The spray booths shall be provided with adequate access for inspection.
(9 VAC 5-50-260)
3. **Emission Controls** - Volatile Organic Compound emissions from the spray booths of the finishing line (F1) shall be minimized by proper spraying technique, use of high solids coating whenever possible, and by complying with the application equipment requirements of the Work Practice Standards of 40 CFR 63, Subpart JJ.
(9 VAC 5-50-20 and 9 VAC 5-50-260)
4. **Emission Controls** - Particulate emissions from the dust collection systems (BH-1, BH-2) shall be controlled by fabric filters. The fabric filters shall be provided with adequate access for inspection and shall be in operation when the dust collection systems are operating.
(9 VAC 5-50-260)
5. **Fugitive Dust/Emission Controls** - Fugitive particulate emissions from the collection, transfer and handling of wood waste shall be controlled by rotary air lock from the collector to an enclosed bin.
(9 VAC 5-50-260)
6. **Monitoring Devices** - Each spray booth shall be equipped with a device to continuously measure the differential pressure drop across the filter. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the respective spray booth is operating.
(9 VAC 5-80-1180, 9 VAC 5-50-20 C, and 9 VAC 5-50-260)
7. **Monitoring Devices** - Each fabric filter shall be equipped with devices to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or

recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the respective fabric filter is operating.
(9 VAC 5-80-1180, 9 VAC 5-50-20 C, and 9 VAC 5-50-260)

OPERATING/EMISSION LIMITATIONS

8. **Emission Limits** - Emissions from the wood finishing operation (F1) shall not exceed the limits specified below:

Particulate Matter	3.2 lbs/hr	13.2 tons/yr
PM-10	3.2 lbs/hr	13.2 tons/yr
Volatile Organic Compounds	99.7 lbs/hr	230.0 tons/yr

(9 VAC 5-50-260)

9. **Emission Limits** - Emissions from the operation of each of the wood dust collection systems (BH-1, BH-2) shall not exceed the limits specified below:

Particulate Matter	0.01 gr/dscf
PM-10	0.01 gr/dscf

(9 VAC 5-50-260)

10. **Visible Emission Limit** - Visible emissions from the finishing operation (F1) spray booth exhausts shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260)

11. **Visible Emission Limit** - Visible emissions from each wood dust system exhaust shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260)

12. **Visible Emission Limit** - Visible emissions from any fugitive emission points shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-260)

13. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the wood finishing operation (F1) equipment as described in Equipment List Condition 1 shall be operated in compliance with the requirements of 40

CFR 63, Subpart JJ. (see MACT Conditions 17 through 25)
(9 VAC 5-60-90 and 9 VAC 5-60-100)

RECORDS

14. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
- Vendor information showing VOC content, toxic compound or HAP content, water content, and solids content for each coating, adhesive, thinner, and cleaning solution used.
 - Monthly and annual emissions calculations to verify compliance with the individual and total emission limitations in Emission Limits Condition 8. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
 - Scheduled and unscheduled maintenance, and operator training as required by Maintenance/Operating Procedures Condition 30.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-50-50)

TESTING

15. **Testing/Monitoring Ports** - The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided when requested at the appropriate locations.
(9 VAC 5-50-30 F)

NOTIFICATIONS

16. **Initial Notifications** - The permittee shall furnish written notification to the South Central Regional Office:
- The actual date on which construction of the spray booths (B13 and B14) and oven (D2) commenced within 30 days after such date.
 - The actual start-up date of the spray booths (B13 and B14) and oven (D2) within 15 days after such date.
- (9 VAC 5-50-50)

MACT CONDITIONS

17. **Emission Standard** - Volatile Hazardous Air Pollutant (VHAP) emissions from the facility shall not exceed the following limits;

- a. For finishing operations use any of the following methods;
 - i. Achieve a weighted average VHAP content across all coatings of 1.0 lb VHAP/lb solids, as applied;
 - ii. Use compliant finishing materials that meet the following specifications:
 - 1) Each sealer and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;
 - 2) Each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;
 - 3) Each thinner contains no more than 10.0 percent VHAP by weight except where excluded by Emission Standard Condition 17.a.ii.5) below;
 - 4) Each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;
 - 5) Each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 1.0 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight;
 - iii. Use any combination of averaging and compliant coatings such that no greater than 1.0 lb of VHAP being emitted per lb of solids used;
- b. For contact adhesive operations compliant contact adhesives shall be used based on the following criteria;
 - i. For aerosol adhesives, as well as hot melt, PVA, and urea-formaldehyde adhesives, and for contact adhesives applied to nonporous substrates there is no limit on the VHAP content of these adhesives;
 - ii. For foam adhesives used in products that meet flammability requirements the VHAP content can be no more than 1.8 lb VHAP/lb solids, as applied;
 - iii. For all other contact adhesives the VHAP content can be no more than 1.0 lb VHAP/lb solids, as applied;

- c. For cleaning operations strippable spray booth coatings shall be used that contain no more than 0.8 lb VOC/lb solids, as applied;

(9 VAC 5-60-100 and 40 CFR 63.802)

18. Continuous Compliance - Continuous compliance with the VHAP emissions limits shall be determined as follows:

(See Notification of Compliance Condition 24 and Reporting Condition 25 for content and timing of report submissions and signature requirements)

- a. For finishing operations when averaging is being used to show continuous compliance, the permittee shall submit the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0. The facility is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots S_nW_n) / (M_{c1} + M_{c2} + \dots + M_{cn})$$

..... Equation 1

E = the emission limit achieved by an emission point or a set of emission points, in lb VHAP/lb solids.

M_c = the mass of solids in a finishing material or coating (c) used monthly, including exempt finishing materials and coatings, lb solids/month.

C_c = the VHAP content of a finishing material or coating (c), in pounds of VHAP per pound of coating solids.

S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials or coatings.

W = the amount of solvent, in pounds, added to finishing materials and coatings during the monthly averaging period.

The Emission Limit (E in lb VHAP / lb solids) equals the sum, for all finishing materials and coatings, of the mass of solids in each material used within that month (M_c in lb solids / month) multiplied by the VHAP content in each material (C_c in lb VHAP / lb solids) plus the sum, for all solvents, of the mass of solvent used monthly (W in lb solvent / month) multiplied by the weight fraction of VHAP in the solvent (S in lb VHAP / lb solvent), with this total being divided by the sum, for all finishing materials and coatings, of the mass of solids in each finishing material and coating used within that month (M_c in lb solids / month).

- b. For finishing operations when compliant coatings are being used to show continuous compliance, the permittee shall use compliant coatings and thinners, maintain records that demonstrate the finishing materials and thinners are compliant, and submit a compliance certification with the semiannual report which states that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in Emission Standard Condition 17, have been used each day in the semiannual reporting period or

should otherwise identify the periods of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

- c. For contact adhesive operations when compliant adhesives are being used to show continuous compliance the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.
- d. For strippable spray booth coatings the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.
- e. For work practice standards the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation and the Administrator may require the permittee to modify the plan (see the Work Practices Standards Condition 22.a.).

(9 VAC 5-60-100, 40 CFR 63.804(g) and 40 CFR 63.8)

19. **Testing** - If compliance testing is conducted the tests shall be conducted using the test methods and procedures as specified in 40 CFR 63.805 of Subpart JJ.
(9 VAC 5-60-100 and 40 CFR 63.805)

20. **Submittals** - All submittals to the Administrator shall be sent to the South Central Regional Office and to EPA Region III at the following address:

EPA Region III
Air Protection Division (3AP00)
ATTN: Wood Furniture NESHAP Coordinator
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-60-100 and 40 CFR 63.13)

21. Operation and Maintenance - The permittee shall meet the following operation and maintenance requirements:

- a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.
- b. Malfunctions shall be corrected as soon as practicable after their occurrence.
- c. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
- d. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(9 VAC 5-60-100 and 40 CFR 63.6(e))

22. Work Practice Standards - The permittee shall develop and implement the following work practice standards:

a. Work practice implementation plan -

- i. The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for the finishing and gluing operations and addresses each of the work practice standards presented in Work Practice Standards Conditions 22.b through 22.l that follow.
- ii. The written work practice implementation plan shall be available for inspection by the Administrator (or delegated State, local, or Tribal authority) upon request. If the Administrator (or delegated State, local, or Tribal authority) determines that the work practice implementation plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator (or delegated State, local, or Tribal authority) may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.
- iii. The inspection and maintenance plan required by Condition 22.c and the formulation assessment plan for finishing operation required by Condition 22.l are also reviewable by the Administrator (or delegated State, local, or Tribal authority).

b. Operator training course - The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and

washoff operations, use of manufacturing equipment in these operations, or implementation of the requirements of Subpart JJ. All new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of the compliance date, December 7, 1998. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

- i. A list of all current personnel by name and job description that are required to be trained;
 - ii. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - iii. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - iv. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- c. Inspection and maintenance plan - The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
- i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
 - ii. An inspection schedule;
 - iii. Methods for documenting the date and results of each inspection and any repairs that were made;
 - iv. The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - 1) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - 2) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

- d. Cleaning and washoff solvent accounting system - The permittee shall develop an organic HAP solvent accounting form to record:
 - i. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in '63.801 of Subpart JJ;
 - ii. The number of pieces washed off, and the reason for the washoff; and
 - iii. The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- e. Chemical composition of cleaning and washoff solvents - The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of Subpart JJ (see attached), in concentrations subject to MSDS reporting as required by OSHA.
- f. Spray booth cleaning - The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- g. Storage requirements - The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- h. Application equipment requirements - The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - i. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - ii. For touchup and repair under the following conditions:
 - 1) The touchup and repair occurs after completion of the finishing operation; or
 - 2) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - iii. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

- iv. When emissions from the finishing application station are directed to a control device;
- v. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
- vi. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasibility:
 - 1) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - 2) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- i. Line cleaning - The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
- j. Gun cleaning - The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
- k. Washoff operations - The permittee shall control emissions from washoff operations by:
 - i. Using normally closed tanks for washoff; and
 - ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
- l. Formulation assessment plan for finishing operations - The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
 - i. Identifies VHAP from the list presented in Table 5 of Subpart JJ (see attached) that are being used in finishing operations;
 - ii. Establishes a baseline level of usage for each VHAP identified. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified, except for formaldehyde and styrene which shall be determined as specified by '63.803 (l)(2).

For VHAPs that do not have a baseline, one will be established according to Work Practices Standards Condition 22.I.vi below.

- iii. Tracks the annual usage of each VHAP identified that is present in amounts subject to MSDS reporting as required by OSHA.
- iv. If the annual usage of the VHAP identified exceeds its baseline level, then the permittee of the facility shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
 - 1) The exceedance is no more than 15.0 percent above the baseline level;
 - 2) Usage of the VHAP is below the de minimis level presented in Table 5 of Subpart JJ for that VHAP ;
 - 3) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
 - 4) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.
- v. If none of the explanations listed in Work Practices Standards Condition 22.I.iv above are the reason for the increase, the permittee shall confer with the South Central Regional Office to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the South Central Regional Office and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- vi. If the facility uses a VHAP of potential concern listed in Table 6 of Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table. The permittee shall track the annual usage of each VHAP of potential concern identified that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of Subpart JJ for that chemical, then the permittee shall provide an explanation to the South Central Regional Office that documents the reason for exceedance of the de

minimis level. If the explanation is not one of those listed in Work Practices Standards Condition 22.1.iv, above, the affected source shall follow the procedures established in Work Practices Standards Condition 22.1.v, above.

(9 VAC 5-60-100 and 40 CFR 63.803(a)-(l))

23. Recordkeeping - The permittee shall maintain records of the following:

- a. For emission limit purposes the permittee shall maintain the following:
 - i. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Subpart JJ,
 - ii. The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Subpart JJ; and
 - iii. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Subpart JJ.
- b. Following the averaging method the permittee shall maintain copies of the averaging calculation for each month following the compliance date, December 7, 1998, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
- c. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
 - i. Records demonstrating that the operator training program required by Work Practice Standards Condition 22.b, above, is in place;
 - ii. Records collected in accordance with the inspection and maintenance plan required by Work Practice Standards Condition 22.c, above;
 - iii. Records associated with the cleaning solvent accounting system required by Work Practice Standards Condition 22.d, above;
 - iv. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period required by Work Practice Standards Condition 22.h, above;
 - v. Records associated with the formulation assessment plan required by Work Practice Standards Condition 22.i, above; and
 - vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

- d. The permittee shall maintain records of the compliance certifications submitted for each semiannual period following the compliance date.
- e. The permittee shall maintain records of all other information submitted with the compliance status report and the semiannual reports.
- f. The permittee shall maintain files of all information (including all reports and notifications) required, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

(9 VAC 5-60-100 and 40 CFR 63.806 & 63.10(b)(1))

24. **Notification of Compliance** - Each time a notification of compliance status is required, the permittee shall submit to the South Central Regional Office and EPA Region III a notification of compliance status, signed by a responsible official of the company that owns or operates the facility who shall certify its accuracy, attesting to whether the source has complied with Subpart JJ. The notification shall list:

- a. The methods that were used to determine compliance;
- b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
- c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;
- d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified;
- e. An analysis demonstrating whether the facility is a major source or an area source (using the emissions data generated for this notification);
- f. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and
- g. A statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in this permit.

(9 VAC 5-60-100 and 40 CFR 63.9(h))

25. **Reporting** - Reporting with regard to 40 CFR 63 Subpart JJ shall consist of the following:

- a. The permittee when demonstrating continuous compliance shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
 - i. The time periods to be addressed are the calendar months **January through June** and **July through December**. Reports shall be submitted to DEQ no later than **March 1** and **September 1** of each calendar year.
 - ii. The semiannual reports shall include the information required by Continuous Compliance Condition 18, a statement of whether the facility was in compliance or noncompliance, and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.
 - iii. The frequency of the reports required by Reporting Condition 25.a, above, shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.
- b. The permittee, when required to provide a written notification by Work Practice Standards Condition 22.liv for exceedance of a baseline level [§63.803(l)(4)], shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than **March 1** after the end of the annual period in which the usage increase occurred.

(9 VAC 5-60-100 and 40 CFR 63.807 & 63.10(d))

GENERAL CONDITIONS

26. **Permit Invalidation** - The portions of this permit to construct the spray booths (B13 and B14) and oven (D2) shall become invalid, unless an extension is granted by the DEQ, if:

- a. A program of continuous construction is not commenced before the latest of the following:
 - i. 18 months from the date of this permit;
 - ii. Nine months from the date that the last permit or other authorization was issued from any other governmental agency;
 - iii. Nine months from the date of the last resolution of any litigation concerning any such permits or authorization; or
- b. A program of construction is discontinued for a period of 18 months or more, or is not

completed within a reasonable time, except for a DEQ approved period between phases of a phased construction project.

(9 VAC 5-80-1210)

27. Right of Entry - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
- b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
- c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
- d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.

(9 VAC 5-170-130)

28. Notification for Facility or Control Equipment Malfunction - The permittee shall furnish notification to the South Central Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but not later than four daytime business hours of the malfunction. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within 14 days of the occurrence. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify South Central Regional Office in writing.

(9 VAC 5-20-180 C)

29. Violation of Ambient Air Quality Standard - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.

(9 VAC 5-20-180 I)

30. Maintenance/Operating Procedures - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.

(9 VAC 5-50-20 E)

31. Permit Suspension/Revocation - This permit may be suspended or revoked if the permittee:

- a. Knowingly makes material misstatements in the application for this permit or any amendments to it;
- b. Fails to comply with the conditions of this permit;
- c. Fails to comply with any emission standards applicable to the equipment listed in Equipment List Condition 1;
- d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;
- e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect on the date that the application for this permit is submitted;
- f. Fails to construct or operate this facility in accordance with the application for this permit or any amendments to it; or
- g. Allows the permit to become invalid.

(9 VAC 5-80-1210)

32. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the South Central Regional Office of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-1240)
33. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-170-160)